

## Lexington-Fayette Urban County Government DEPARTMENT OF LAW

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PUBLIC SERVICE COMMISSION

> Janet M. Graham Commissioner

Jim Gray Mayor

December 12, 2012

Mr. Jeff Derouen Executive Director Public Service Commission 211 Sower Boulevard P.O. Box 615 Frankfort, Kentucky 40602-0615

Re:

Case No. 2012-00520

(Kentucky-American Water Company)

Dear Mr. Derouen:

Please find enclosed herewith for filing an original and ten (10) copies of Lexington-Fayette Urban County Government's Motion to Intervene in the referenced matter.

Yours truly, J. Marby.

David J. Barberie Managing Attorney

**ENC** 

cc: Case Distribution List

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 Lexington, KY 40588
 (859) 258-3500
 www.lexingtonky.gov
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## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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DEC 1 3 2012

PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY AMERICAN	)	
WATER COMPANY FOR A GENERAL RATE	)	CASE NO.
INCREASE	)	2012-00520
	)	

## LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT'S MOTION FOR FULL INTERVENTION AND WAIVER

COMES the Lexington-Fayette Urban County Government ("Lexington"), by counsel, and pursuant to 807 KAR 5:001 Section 3(8), moves that it be granted leave to intervene in this matter and that it be granted full intervention status. Approval of the application in this matter will have a significant impact on Lexington and the citizens of Fayette County. Lexington has a special interest in this matter, and it will not be adequately represented by the other parties. Lexington's participation in this matter is likely to assist the Commission in developing and identifying facts and issues and in fully considering this matter without unduly complicating or disrupting the proceedings. Lexington certifies that it and its authorized agents possess the facilities to receive electronic transmissions and waive the right to receive service of Commission Orders by U.S. Mail, if so ordered by the Commission. The undersigned individuals are designated as Lexington's authorized agents to receive all documents and pleadings by electronic means in this proceeding on its behalf.

Respectfully submitted,

BY:

David J. Barberie dbarberi@lexingtonky.gov

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Commissioner of Law

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Attorney

Department of Law

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Lexington, Kentucky 40507

(859) 258-3500

Attorneys for Lexington-Fayette Urban

County Government

## **CERTIFICATE OF COMPLIANCE**

I hereby certify that on December 12, 2012, a true and accurate copy of the above motion was mailed by first class U.S. Mail, postage prepaid, to the following:

Lindsey W. Ingram, III, Esq. Monica Braun, Esq. Stoll Keenon Ogden PLLC 300 West Vine Street Suite 2100 Lexington, KY 40507-1801

Hon. David Edward Spenard Assistant Attorney General Office of the Attorney General (Rate Intervention) 1024 Capital Center Drive Suite 200 Frankfort, Kentucky 40601-8204

ATTORNEY FOR LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT

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